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**IN THE UNITED STATES BANKRUPTCY COURT**  
**THE DISTRICT OF ARIZONA**

In re:	Chapter 11 Proceedings
WILLOW CREEK PARTNERS, LLC, JOY LANE, LLC,	Case No. 2:11-bk-6060-RTBP Case No. 2:11-bk-6062-RTBP
Debtors.	Joint Administration Under Case No. 2:11-bk-6060-RTBP
This filing applies to:  <input checked="" type="checkbox"/> ALL DEBTORS <input type="checkbox"/> SPECIFIED DEBTORS	<b>MOTION FOR JOINT ADMINISTRATION AND APPROVAL OF A CONSOLIDATED CAPTION</b>

Pursuant to Federal Rule of Bankruptcy Procedure 1015 and Local Rule of Bankruptcy Procedure 1015-1, Willow Creek Partners, LLC, debtor and debtor-in-possession in the above-referenced bankruptcy ("Willow Creek"), through counsel undersigned, hereby requests that this Court order the joint administration of its Chapter 11 case, numbered 2:11-bk-6060-RTBP, with that of its affiliate Joy Lane, LLC ("Joy Lane"), (collectively with Willow Creek, the "Debtors"), which is being administered under case number 2:11-bk-6062-RTBP. The joint administration of these related cases will allow for a more efficient and equitable administration of both Debtors' estates.

This Motion is supported by the attached Memorandum of Points and Authorities.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. FACTUAL BACKGROUND**

3 1. On March 11, 2011 (the “Petition Date”), the Debtors filed their respective  
4 voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in the United States  
5 Bankruptcy Court for the District of Arizona.

6 2. The Debtors are authorized to operate their businesses as debtors-in-possession  
7 pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

8 3. The Debtors are Arizona limited liability companies authorized to conduct business  
9 in the state of Arizona.

10 4. The Debtors share common ownership and management.

11 5. The Debtors share the same primary creditors.

12 6. On the Petition Date, both Debtors filed plans of reorganization.

13 7. Those plans are nearly identical, such that the proceedings and evidence necessary in  
14 seeking confirmation of one plan will be identical to those required in seeking confirmation of the  
15 other.

16 **II. LEGAL ARGUMENT**

17 If related or affiliated debtors have bankruptcy cases pending in the same court, their  
18 respective estates may be jointly administered under a consolidated caption. Fed. R. Bankr. P.  
19 1015(b).<sup>1</sup> “Joint administration is a creature of procedural convenience. It is justified by the  
20 laudable desire to avoid the wasting of resources, which would result through the duplication of  
21 effort if cases involving related debtors were to proceed entirely separately.” *In re Steury*, 94 B.R.  
22 553, 553 (Bankr. N.D. Ind. 1988).

23 The Debtors’ bankruptcies are the type best-suited for joint administration. The Debtors  
24 share common ownership and control, share common secured creditors and, because their plans of  
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27 <sup>1</sup> A motion requesting joint administration must be accompanied by a request that all affiliated cases  
28 be transferred to the judge presiding over the case with the lowest number. Local Bankruptcy Rule of  
Procedure 1015(b). In these cases, no such transfer is necessary, as all cases were assigned to the same  
Judge.

1 reorganization are nearly identical, their prospects for reorganization are completely intertwined.  
2 Because of the inter-relatedness of the Debtors and their plans of reorganization, the vast majority  
3 of motions, hearings, and orders in these cases will apply with equal force to both Debtors and their  
4 respective creditors. As such, the joint administration of these cases will not prejudice any party in  
5 interest, but, rather, will benefit all parties involved through the provision of a unified and efficient  
6 administration of both Debtors' estates.

7 Joint administration of these Debtors' cases, and the use of a consolidated caption, will  
8 avoid unnecessary duplication of effort, reduce the time and cost attendant to reorganization under  
9 Chapter 11, and provide creditors whose interests may be affected by both Debtors' bankruptcies a  
10 single forum in which to assert their claims.

11 WHEREFORE, the Debtors respectfully request that the Court enter an Order:

- 12 a. Authorizing the joint administration of the Debtors' Chapter 11 cases;  
13 b. Authorizing the use of the consolidated caption above; and  
14 c. Granting such other and further relief as the Court deems just and proper  
15 under the circumstances.

16 DATED: March 10, 2011.

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26 **COPY** of the foregoing mailed (or served via  
27 electronic notification if indicated by an "\*" )  
28 on March 10, 2011, to:

U.S. TRUSTEE'S OFFICE  
230 N. 1<sup>st</sup> Avenue, Suite 204  
Phoenix, AZ 85003

By: /s/ Diane Ashworth